

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

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-v-
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MARC E. VERZANI,

:
Defendant.
:
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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 3/8/12

PROTECTIVE ORDER ON CONSENT

S1 12 Cr. 24 (CS)

Upon consideration of the application of the United States Attorney for the Southern District of New York for the entry of a Protective Order on Consent, and for good cause shown, IT IS HEREBY ORDERED THAT:

1. Documents and tape recordings, and information contained in such materials, including the identity of potential witnesses in such materials provided by the Government to the defendant MARC E. VERZANI ("VERZANI" or the "defendant") in this action for the purpose of providing Rule 16 discovery or 3500 material are deemed confidential ("Confidential Information"). Confidential Information does not include any document or information produced in discovery that the defendant otherwise lawfully possesses or has obtained through separate lawful means. Confidential Information disclosed to VERZANI'S counsel of record in this action:

- A. Shall be used by VERZANI and his counsel of record in this action solely for purposes of this criminal action; and
- B. Shall be reviewed by VERZANI only under the supervision of his counsel of record, and shall not be copied or reproduced other than for internal use by counsel; and
- C. Shall not be disclosed by either VERZANI or his counsel of record in this action to any third party other than the following:
 - (i) investigative, secretarial, clerical, paralegal and student personnel employed full-time or part-time by defendant's attorney;
 - (ii) independent expert witnesses, investigators or advisors retained by defendant in connection with this action;
 - (iii) such other persons as hereafter may be authorized by the Court upon a motion by defendant.

2. The defendant and his counsel shall provide a copy of this Order to designated persons to whom they disclose confidential information pursuant to Paragraph 1(C)(i)-(iii). Designated persons shall be subject to the terms of this Order.

3. The provisions of this Order shall not be construed as preventing the disclosure of any information in any motion, hearing or trial held in this action or to any judge or magistrate of this Court for purposes of this action.

4. VERZANI agrees that he has no ownership or proprietary interest in the materials subject to this Protective Order. VERZANI further agrees that all such materials are to be returned to the Government at such time as they are no longer needed in this action, at the end of the criminal proceeding, or upon Order of the Court, whichever occurs first.

Dated: White Plains, New York
March 8, 2012

Accepted and Acknowledged:

PREET BHARARA
United States Attorney
Southern District of New York

By: Cynthia K. Dunne
Cynthia K. Dunne
Lee Renzin
Assistant United States Attorneys

By: Guy Petrillo
Guy Petrillo, Esq.
Attorney for Marc E. Verzani

SO ORDERED:

Cathy Seibel 3/8/12
HONORABLE CATHY SEIBEL
UNITED STATES DISTRICT JUDGE

Marc VERZANI